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June 19, 2023

VIA ECF

Hon. Nelson S. Román
United States District Judge
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: *Palisades Estates EOM, LLC et al. v. County of Rockland, New York et al.*,
Case No. 7:23-cv-04215 (NSR)**

Dear Judge Román:

We represent Plaintiffs in the above-referenced action. We write to request that the Court permit Plaintiffs to file, by July 20, 2023, a single opposition of no more than five pages to all letters seeking a pre-motion conference concerning a motion to dismiss.

The Court has received a total of eleven letters seeking pre-motion conferences for motions to dismiss on behalf of Defendants Orangetown, Niagara County, Onondaga County, St. Lawrence County, Saratoga County, Sullivan County, Broome County, Oneida County, Allegany County, Orange County, Rockland County, and Madison County (the “Moving Parties”). Plaintiffs’ deadline to respond to each of those letters is Thursday, June 22, 2023. On June 16, 2023, the Court extended Defendants’ deadline to file any responsive pleadings or motions to July 17, 2023, and we expect that the Court will receive additional requests for pre-motion conferences.

In the interest of judicial economy, Plaintiffs respectfully request leave to file a single, extended opposition to the Moving Parties’ pre-conference letters. Plaintiffs further respectfully request that their opposition be due July 20, 2023 so that Plaintiffs’ opposition may also respond to any additional pre-motion conference letters filed after the current response date. We contacted counsel for the Moving Parties on June 16, 2023 requesting their consent but have not received any responses¹ as of the date of this letter.

¹ Defendant Oneida County replied that it consented to extending the time to respond to July 20, 2023.



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Thank you for Your Honor's continued attention to this matter.

Respectfully submitted,

/s/ Perry M. Amsellem
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CC: All Counsel